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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GIANNI VERSACE, S.R.L.,

Plaintiff,

v.

R & B ONLINE TRADING, CORP.; ROMAN
BONDARENKO; and “JOHN DOES” 1-5,

Defendants.

CASE NO. 7:22-cv-06081

~~PROPOSED~~ FINAL JUDGMENT AND
INJUNCTION ON CONSENT
AGAINST DEFENDANT
R & B ONLINE TRADING, CORP.

THIS MATTER comes before the Court on consent from Gianni Versace S.r.l. (“Plaintiff” or “Versace”) and R & B Online Trading, Corp. (“Defendant”) hereby alleges as follows:

The Court, having considered all pleadings and other documents filed in this action, hereby directs the entry of this Final Judgment and Injunction against Defendant. Accordingly, the Court does hereby **ORDER, ADJUDGE, AND DECREE** as follows:

1. This Court has jurisdiction over the subject matter of this action.
2. Venue is proper in the Southern District of New York.
3. Defendant is subject to the jurisdiction of this Court pursuant to and in accordance with the laws of the State of New York, the United States Constitution, and Rule 4 of the Federal Rules of Civil Procedure.
4. Plaintiff is the owner of, including, but not limited to, the following federal trademarks which are registered in the U.S. Patent and Trademark Office:

Image	Country	Wording	Device	Type	Status	*	Appln. Date	Appln. Number	Reg. Date	Reg. Number	Subsequent designation	Notification date	Renewal Deadline	Int. Classes	Owner	
	U.S.A.		"V" SEWING	Device	Acceptance ex officio without refusal	INT	04/08/2006	11768-D/2006	31/08/2006	903043		N.A.	31/08/2026	N25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		CAP, BOTTLE, CIRCULAR FRET, MEDUSAS HEAD	Tridimensional	Registered		17/01/2006	793170	27/04/2010	378280			27/04/2030	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		CAP, OVAL BOTTLE, CIRCULAR FRET, MEDUSAS HEAD	Tridimensional	Registered		04/10/2010	85144352	28/06/2011	3984609			28/06/2031	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		CIRCULAR FRET PATTERN	Device	Total acceptance	INT	27/04/2005	11117-D/2005	26/05/2005	863493		N.A.	26/05/2025	N03N09N14N16 N18N24N26	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		FRET PATTERN	Device	Final partial refusal	INT	04/08/2006	11767-D/2006	10/10/2006	922170			07/06/2007	10/10/2026	P03P09P18P20 P24P25P26	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.		LINEAR FRET PATTERN	Device	Total acceptance	INT	27/04/2005	11116-D/2005	26/05/2005	866162		N.A.	26/05/2025	L03L09L14L16L18L24 25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		MEDUSA HEAD (VERSION 8)	Device	Registered		09/01/2018	87748570	14/08/2018	5540330			14/08/2028	26	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		MEDUSA HEAD (VERSION 8)	Device	Registered		07/06/2019	88464503	17/12/2019	5937934			17/12/2029	09	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		MEDUSA HEAD (VERSION 8)	Device	Pending application		07/03/2022	97298,406						09 35 41 42	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	

Image	Country	Wording	Device	Type	Status	*	Appn. Date	Appn. Number	Reg. Date	Reg. Number	Subsequent designation	Notification date	Renewal Deadline	Int. Classes	Owner	
	U.S.A.		MEDUSA HEAD IN CIRCULAR GREEK (VERSION 4)	Device	Registered		31/05/1998	112541	22/07/1997	2081230			22/07/2027	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALIA	
	U.S.A.		MEDUSA HEAD IN CIRCULAR GREEK (VERSION 4)	Device	Registered		17/05/1993	391423	24/01/1995	1875093			24/01/2025	09 14 16 21	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALIA	
	U.S.A.		MEDUSA HEAD IN CIRCULAR GREEK (VERSION 4)	Device	Registered		03/05/1996	98204	15/07/1997	2078918			15/07/2027	L26	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALIA	
	U.S.A.		MEDUSAS HEAD DEVICE (VERSION 8)	Device	Registered		28/07/2003	536034	02/08/2005	2980455			02/08/2025	L03 08,09,11L14L1 8 19L,20L,21L,24 25 27	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALIA	
	U.S.A.		MEDUSAS HEAD DEVICE (VERSION 8)	Device	Final partial refusal	INT	21/09/2012	12035-D/2012	21/09/2012	1139072			13/12/2012	21/09/2032	P33	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.		PATTERN THE GREEK	Device	Final partial refusal	INT	06/08/2015	11706-D/2015	18/08/2015	1291548			10/03/2016	18/08/2025	P03P09P14P18 P21P25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.		STYLIZED "V"	Device	Acceptance ex-officio without refusal	INT	04/08/2006	11770-D/2006	31/08/2006	902034		N.A.	31/08/2026	N25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		STYLIZED "V"	Device	Acceptance ex-officio without refusal	INT	04/08/2006	11769-D/2006	31/08/2006	931491		N.A.	31/08/2026	N25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.		THREE DIMENSIONAL BOTTLE WITH LION'S HEAD	3dimensional	Registered		21/03/1994	503797	10/12/1996	2022368			10/12/2026	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALIA	

Image	Country	Wording	Device	Type	Status	*	Appn. Date	Appn. Number	Reg. Date	Reg. Number	Subsequent designation	Notification date	Renewal Deadline	Int. Classes	Owner	
Word	U.S.A.	DYLAN BLUE		Word	Final partial refusal	INT	23/12/2015	12362-D/2015	23/12/2015	1309180		15/09/2016	23/12/2025	P03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	DYLAN PURPLE		Word	Registered	INT	05/04/2022	342022000049979	05/04/2022	1668646		30/06/2022	05/04/2032	03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	DYLAN TURQUOISE		Word	Total provisional refusal	INT	23/01/2020	10666-D/2020	23/01/2020	1523591		02/04/2020	23/01/2030	P03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	PALAZZO EMPIRE		Word	Final partial refusal	INT	09/02/2016	10751-D/2016	09/02/2016	1299889		23/06/2016	09/02/2026	P18	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.	V	BAROQUE VERSION	Word and device	Pending application		08/09/2021	97/017764						09	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
	U.S.A.	V	BAROQUE VERSION	Word and device	Total provisional refusal	INT	14/02/2019	10734-D/2019	14/02/2019	1481566		08/08/2019	14/02/2029	L03L09L14L18L25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		28/02/1995	64870	14/09/1999	2278257			14/09/2029	42	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		05/10/1994	582355	16/12/1997	2121984			16/12/2027	L03L18L25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		28/05/1996	110711	22/09/1998	2190233			22/09/2028	09	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		06/12/1999	864716	03/04/2001	2440541			03/04/2031	N08N19N20N21	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		09/05/2011	85/315871	10/01/2012	4082997			10/01/2032	N20	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Registered		07/06/2019	88/464490	30/06/2020	6088586			30/06/2030	P09	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Pending application published		23/06/2021	90/791413						L35	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Pending application		07/03/2022	97/298387						09 35 41 42	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Pending application		26/04/2022	97/382561						35	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY	
Word	U.S.A.	VERSACE		Word	Partial invalidation	INT	11/08/2009	11557-D/2009	03/09/2009	1018595			26/11/2009	03/09/2029	L09	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE		Word	Partial invalidation	INT	25/10/2010	12264-D/2010	09/11/2010	1073076			28/04/2011	09/11/2030	N11N14N27N35	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE		Word	Total provisional refusal	INT	25/10/2010	12264-D/2010	09/11/2010	1073076			08/02/2021	25/03/2031	09/11/2030 L16L42	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE BLUE JEANS		Word	Registered		14/11/1994	598827	15/04/1997	2053186				15/04/2027	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
															F0066150	

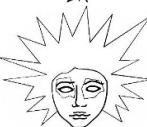
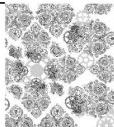
Image	Country	Wording	Device	Type	Status	*	Appn. Date	Appn. Number	Reg. Date	Reg. Number	Subsequent designation	Notification date	Renewal Deadline	Int. Classes	Owner
	U.S.A.	VERSACE COLLECTION	FRAME	Word and device	Final partial refusal	INT	30/11/2015	12213-D/2015	30/11/2015	1293440		24/03/2016	30/11/2025	P18P25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.	VERSACE DREAM	HORIZONTAL LINES	Word and device	Total provisional refusal	INT	24/09/2021	274606	27/09/2021	1633596		16/12/2021	27/09/2031	L18L25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.	VERSACE EROS		Logo	Final partial refusal	INT	20/03/2018	10904-D/2018	20/03/2018	1431132		01/11/2018	20/03/2028	P03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.	VERSACE EROS FLAME		Logo	Final partial refusal	INT	18/01/2019	10637-D/2019	18/01/2019	1474151		27/06/2019	18/01/2029	P03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE JEANS COUTURE		Word	Registered		09/07/1998	519687	06/02/2001	2426052				L18L25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE JEANS COUTURE		Word	Registered		25/10/2001	330062	23/12/2003	2798577			23/12/2023	18 25	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE RED JEANS		Word	Registered		14/11/1994	598858	15/04/1997	2053187			15/04/2027	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSACE THE DREAMER		Word	Registered		20/09/1998	169332	13/10/1998	2194621			13/10/2028	L03	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
Word	U.S.A.	VERSUS		Word	Registered		17/11/2004	518310	22/05/2007	3243564			22/05/2027	14	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY
	U.S.A.	VERSUS VERSACE	HEAD OF LION, CIRCLE (VERSION 2)	Word and device	Registered		26/06/2014	86/321572	01/12/2015	4864033			01/12/2025	L14	GIANNI VERSACE S.R.L., PIAZZA LUIGI EINAUDI 4, 20124 MILANO, ITALY

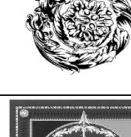
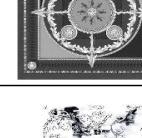
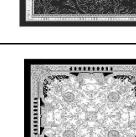
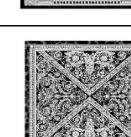
(Hereinafter collectively referred to as the “Plaintiff’s Registered Trademarks”).

5. Plaintiff is also the owner of, including, but not limited to, the following federal copyrights which are registered in the U.S. Copyright Office:

Name	Image	Copyright registration no.
LINEAR SPORT		VA1-110-968
MEDUSA		VA1-110-972
MEDUSA		VA1-110-970
MEDUSA		VA1-110-969
MEDUSA		VA-110-971
EXCITING		VA1-113-897
EMOTIONAL		VA1-113-896
EY THEREAL		VA1-113-895
ETICHETTA		VA1-772-605
PATTERN VANITAS		VA1-782-867
GRID		VA-799-572
TESTA DI MEDUSA		VA1-804-381
MEDUSA VERSIONE 2		VA1-804-375

MEDUSA VERSIONE 3		VA1-804-376
MEDUSA VERSIONE 3 TRIANGolo		VA1-804-370
MEDUSA VERSIONE 4		VA1-804-369
MEDUSA VERSIONE 4 SCRITTA		VA1-804-378
MEDUSA VERSIONE 5		VA-804-380
MEDUSA VERSIONE 6		VA1-804-386
MEDUSA VERSIONE 9		VA1-804-383

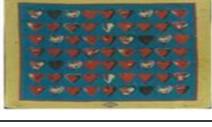
MEDUSA VERSIONE 11		VA1-804-372
MEDUSA VERSIONE 12		VA1-804-373
LEONE		VA1-813-367
MEDUSA PUNKYOUNG		VAU1-117-668
STAMPE BAROCCO		VA1-841-945
STAMPE BAROCCO		VA1-804-386

STAMPE BAROCCO		VA1-841-941
STAMPE BAROCCO		VA1-841-936
RICCIOLI BAROCCO		VA1-867-061
STAMPA JEWELS		VA1-935-106
FAUVE BAROQUE		VAU1-149-871
STELLA MARINA GIOIELLO		VAU1-156-195
LIBELLULA GIOIELLO		VAU1-156-234
STAMPA SALONE DEL MOBILE 2014		VA1-919-735
STAMPA SALONE DEL MOBILE 2014		VA1-919-710
STAMPA SALONE DEL MOBILE 2014		VA1-919-711
STAMPA SALONE DEL MOBILE 2014		VA1-919-714
STAMPA SALONE DEL MOBILE 2014		VA1-919-719

STAMPA SALONE DEL MOBILE 2014		VA1-919-715
SPILLA TESTA DI LEONE		VA1-918-316
STAMPA BAROCK		VA1-948-409
STAMPA GALLERIA		VA1-948-410
PATTERN THE GREEK		VA1-951-353
VERSACE EMOTICON		1-2403087341
TESTA DI LEONE 3D		VA2-022-614

CONTORNO MEDUSA		1-4214564851
NUOVO B BAROCCA - ORNAMENTO		VA2-180-223
BAROCCO		VA2-173-518
POP HEARTS		VA2-173-519
622		VA2-176-199
669		VA2-176-138

672		VA2-176-527
705		VA2-176-545
BAROCCO		VA2-178-621
BAROCCO 57		VA2-176-201
BAROCCO STRIPES 495		VA2-176-998
BESTIARIO 589		VA2-176-202
GOLD BAROQUE 523		VA2-176-205

JUNGLE PRINT		VA2-175-854
JUNGLE PRINT		VA2-178-183
LOVE VERSACE (FLAME)		VA2-184-151
LOVE VERSACE (RAINBOW)		VA2-184-154
POP HEARTS		VA2-180-756
THE CLASH		VA2-151-779

WILD BAROQUE		VA2-176-997
"tresor de la mer attuali rosa"		VA 2-271-038
"tresor de la mer attuali azzurro"		VA 2-271- 039
"tresor de la mer attuali bianco"		VA 2-271- 040
"tresor de la mer attuali bianco nero"		VA 2-271- 043
"tresor de la mer old mix"		VA2-271-044
"tresor de la mer 232"		VA2-176-995

(Hereinafter collectively referred to as the "Plaintiff's Registered Copyrights".) (The Plaintiff's Registered Trademarks and the Plaintiff's Registered Copyrights may hereinafter be

collectively referred to as the "Versace IP".)

6. Plaintiff is responsible for assembling, finishing, marketing, and selling in interstate commerce high-quality Versace merchandise.

7. Plaintiff is the exclusive distributor and warrantor in the United States of Versace merchandise, all of which bear one or more of Plaintiff's Registered Trademarks and/or Plaintiff's Registered Copyrights.

8. Plaintiff has used the Versace IP in the United States and in interstate commerce for many years.

9. The Versace IP is entitled to protection under the federal trademark and/or copyright laws and under the laws of the State of New York.

10. On July 18, 2022, Plaintiff filed its Complaint against Defendant.

11. Accordingly, the Court hereby permanently enjoins and restrains Defendant from:

- a) using any counterfeit or infringement of the Versace IP to identify any goods not authorized by Plaintiff;
- b) infringing the Versace IP by importing, manufacturing, distributing, selling, offering for sale, advertising, promoting, displaying any products bearing any simulation, reproduction, or copy of the Versace IP;
- c) using any simulation, reproduction, or copy of the Versace IP in connection with the importation, promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation, or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiff, or to any goods sold, manufactured, sponsored or approved by, or connected with Plaintiff;
- d) making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any services provided, products manufactured, distributed, sold or offered for sale, or rented by Defendant are in any way associated or connected with Plaintiff;
- e) engaging in any other conduct constituting an infringement of the Versace IP, of Plaintiff's rights in, or to use or to exploit, said trademark, or constituting any weakening of Plaintiff's names, reputations, and goodwill.

12. Pursuant to and in accordance with 15 U.S.C. § 1117(c), but limited by certain requirements in a January 16, 2023 settlement agreement between the parties ("Settlement

Agreement”), the Court hereby Orders Defendant to pay Plaintiff One Hundred Thousand Dollars (\$100,000.00).

13. This Final Judgment and Injunction is deemed served on Defendant as of entry therein.

14. The terms of this Final Judgment and Injunction shall govern and bind the activities of the Defendant, its agents, servants, employees, and attorneys, and all persons in active concert or participation therewith. This Final Judgment and Injunction shall carry over to any successor companies to Defendant, except as limited by the Settlement Agreement.

15. All claims asserted against Roman Bondarenko and “John Doe” defendants are dismissed with prejudice.

16. This Court reserves and retains jurisdiction of the subject matter of this cause and of the parties hereto for the purpose of enforcing the terms of this Final Judgment and Injunction on Consent.

Dated: January 17, 2023



Philip M. Halpern
United States District Court Judge